

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re:	)	
TIMOTHY M. WOLF	)	Case No. 11-29696-svk
PATRICIA J. WOLF,	)	Chapter 13
	)	
Debtor.	)	

---

**OBJECTION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

---

Please take notice that the debtors, Timothy M. Wolf and Patricia J. Wolf, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby object to the Motion for Relief from the Automatic Stay as brought by creditor.

The debtors assert that they failed to make all required mortgage payments due to unexpected medical expenses and vehicle repairs. However, the debtors shall resume making regular monthly mortgage payments, beginning with the payment due for the month of December 2014. The debtors request that any and all remaining arrearages be paid through the plan as a supplemental claim. Additionally, the debtors have requested that payments be made via automatic account withdrawal.

The debtors respectfully request that the Court schedule a hearing on the matter.

Dated: December 17, 2014.

DeLadurantey Law Office, LLC  
Attorneys for Debtor

/s/

---

By: Nathan E. DeLadurantey  
State Bar No. 1063937

Drafted by:  
Daniel T. Beasley  
SBN 1092029  
735 W Wisconsin Ave., Suite 720  
Milwaukee, WI 53233  
(414) 377-0515; Fax (414) 755-0860  
dan@delaw-law.com

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re:	)	
TIMOTHY M. WOLF	)	
PATRICIA J. WOLF	)	Case No. 11-29696-svk
	)	Chapter 13
	)	
Debtors.	)	

---

**CERTIFICATE OF SERVICE**

---

Caitlin York states under oath that she is over the age of 18 and a paralegal at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on December 17, 2014, she delivered true and correct copies of the attached "Objection to Motion for Relief from the Automatic Stay" and "Certificate of Service" via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court  
Eastern District of Wisconsin  
*via CM/ECF*

Trustee Mary B. Grossman  
*via CM/ECF*

Office of the United States Trustee  
*via CM/ECF*

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2014.

Signed: /s/ Caitlin York  
Caitlin York

Drafted by:  
Daniel T. Beasley  
SBN 1092029  
735 W. Wisconsin Avenue, Suite 720  
Milwaukee, WI 53233  
(414) 377-0515; Fax (414) 755-0860  
dan@delalaw.com